EXHIBIT 91

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

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BLUE FLAME MEDICAL LLC, :
Plaintiff, :
v. : Civil Action No.
CHAIN BRIDGE BANK, N.A., JOHN : 1:20-cv-00658
J. BROUGH and DAVID M. :
EVINGER, : CONFIDENTIAL
Defendants. :
_____ :
CHAIN BRIDGE BANK, N.A., :
Third-Party Plaintiff, :
v. :
JPMORGAN CHASE BANK, N.A., :
Third-Party Defendant. :

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Remote Deposition

Tuesday, January 19, 2021

Videotaped Deposition via Zoom of MICHAEL WONG, a witness herein, called for examination by

terms due on receipt. Do you see that?

A. Yes, sir.

Q. And you understood that Blue Flame was requiring prepayment upon receipt of this invoice, correct?

A. Yes, sir.

Q. Excuse me, upon your receipt of its invoice, correct?

A. Yes, sir.

Q. And did you understand that Blue Flame needed to receive that prepayment so that it could secure the product from its suppliers?

MS. PORTER: Objection. Asked and answered.

THE WITNESS: Yes.

BY MR. MITCHELL:

Q. This invoice attached to Defendant's Exhibit 20 was consistent with your negotiations with Mr. Thomas, correct?

MS. PORTER: Objection. Asked and answered.

THE WITNESS: Yes.

Exhibit 67.

MR. MITCHELL: Greg, you may need to republish that one in the chat.

BY MR. MITCHELL:

Q. Mr. Wong, please let me know when you have that one in front of you. Apologies.

MR. MITCHELL: Greg, could you please republish Defendant's Exhibit 27.

THE WITNESS: Are we looking at Exhibit 67 or Exhibit 27?

BY MR. MITCHELL:

Q. Well, if you have Exhibit 67 in front of you, very quickly -- do you have it in front of you?

A. Yes, sir.

Q. And on the first page of Exhibit 67, which is the email from Mr. Littman to you on April 3rd, 2020, you see those same four models of N95 masks listed that were previously listed in the invoice and in your purchase order, correct?

A. Yes, sir.

Q. And none of those masks were 3M brand masks, correct?

MS. PORTER: Objection. Asked and answered.

THE WITNESS: I don't remember at the time what model numbers were associated with what brands.

BY MR. MITCHELL:

Q. Okay. Sitting here today, you understand that none of those models of masks are 3M brand masks, correct?

A. Yes, sir.

Q. And on the second page of that email from Mr. Littman, do you see, Mr. Wong, that Mr. Littman writes, "Also here is the information for the State of Maryland. Maryland has placed a significant order with Blue Flame."

And then he lists Danny Mays, director, Office of State Procurement, Maryland Department of General Services.

Do you see that?

A. Yes, sir.

Q. Did you ever discuss Blue Flame with any representative of the State of Maryland?

A. No, I did not.